



March 14, 2014

California Department of Water Resources  
Division of Integrated Regional Water Management  
Financial Assistance Branch

Keith Wallace  
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**Subject: Coachella Valley IRWM Region Suggestions for Process Improvements**

Dear Mr. Wallace and Mr. Eusuff,

The Coachella Valley Regional Water Management Group (CVRWMG) would like to thank the California Department of Water Resources (DWR) for the opportunity to provide input and suggestions to DWR for process improvements associated with the Integrated Regional Water Management Program (IRWM) grant application and solicitation process.

Our suggestions for improvements to the IRWM grant application and solicitation process focus on the potential for an expedited round of Proposition 84 IRWM grant funding to address drought relief that was recently approved by the legislature and the Governor (AB 103 and SB 104). Specifically, we have been informed that the \$200 million in expedited drought relief funding may be allocated to IRWM regions as early as August 2014, but have not received any direction or input from DWR regarding interpretation of the aforementioned legislation and the way in which expedited drought-relief funding will be allocated through the IRWM Program.

Our specific concerns regarding the expedited drought-relief funding include:

**1) Immediate Need for Clear Direction**

As you may be aware, the Coachella Valley recently adopted an updated IRWM Plan consistent with the 2012 IRWM Program Guidelines established by DWR. In accordance with the Guidelines, the 2014 Coachella Valley IRWM Plan includes comprehensive outreach and stakeholder involvement to ensure that all Coachella Valley IRWM stakeholders are involved in

and understand the process used for submitting, reviewing, and selecting IRWM projects. In order to honor the project review and selection process outlined in our IRWM Program, we need immediate direction from DWR so that we may inform our stakeholders about the funding opportunity as it specifically applies to the Coachella Valley IRWM Region. This immediate direction is of particular importance to our IRWM Region, which has provided substantial amounts of IRWM funding to disadvantaged communities (DACs) and non-governmental organizations (NGOs). The CVRWMG is committed to providing technical support to DACs, NGOs, and all other stakeholders as needed to prepare for the upcoming funding opportunity, but will be unable to do so until DWR provides guidance.

## **2) Direction on Drought Relief Contingencies**

The Coachella Valley IRWM Region would like specific direction from DWR about what kind of projects qualify as “drought relief” projects and if any of the Funding Areas will be prioritized over others to receive these funds due to their specific drought conditions. Further, we would like specific direction on the timing for funding, including the time by which a project would need to begin and end implementation in order to be eligible for funding.

## **3) Funding Allocations by Funding Areas**

The Coachella Valley IRWM Region requests that DWR provide a funding allocation schedule to provide guidance on the maximum amount of funding that will be available per Funding Area as has been done in previous rounds of IRWM funding. This request is particularly important for the Colorado River Funding Area, within which multiple IRWM regions compete for funding.

## **4) Streamlined Grant Application**

In conjunction with the first concern expressed above, the Coachella Valley IRWM Region requests that DWR implement a streamlined grant application that reduces or eliminates the rigorous cost-benefit analysis that has been required in previous rounds of Proposition 84 Implementation Grant funding. If DWR were to honor this request, our Region and other regions throughout the State would be able to spend less time putting together the grant application and instead focus on implementing a robust and transparent project selection process that involves all interested stakeholders and is consistent with our IRWM Plan.

## **5) Adjust Process for Regulatory Permits**

Although not yet formally expressed by DWR, there has been indication that any projects funded with the expedited drought relief funds will need to be implemented quickly. While the CVRWMG appreciates DWR’s focus on speedy implementation to alleviate drought-related issues, we are concerned that this potential requirement would mean that any projects that have not already secured environmental and other regulatory permits would not be eligible to receive expedited drought-relief funds. If DWR is to require that projects be implemented within an expedited manner, we request that DWR work with the California Department of Fish and Wildlife, the State Water Resources Control Board, and other regulatory agencies to expedite or reduce regulatory permitting requirements for these projects. Reducing regulatory requirements would ensure that our grant proposal includes projects that provide maximum benefits to alleviate drought conditions and meet regional needs instead of focusing on projects that are currently far enough along in the development process to be implemented within a short time period.

## Conclusion

The CVRWMG thanks DWR for the opportunity to provide input on potential process improvements associated with IRWM grant funding. Our region appreciates DWR's solicitation of our input and hopes the suggestions in this letter are useful to clarify our specific concerns regarding the expedited drought relief funding and its potential impact on our region.

Sincerely,

A handwritten signature in black ink that reads "Patti Reyes". The script is cursive and fluid, with the first name "Patti" and last name "Reyes" clearly legible.

Patti Reyes on behalf of the CVRWMG  
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